

Memorandum



942.3

Date: May 14, 1985
To: Tim Croll
From: Lorna Campion *Lorna Campion*
Subject: EPA/SCL LUSP Contamination Settlement Negotiations

On May 13, Tim Croll, Lorna Campion, and Liz Edmonds (Counsel) met with EPA staff to discuss negotiations and schedule for settlement regarding the LUSP PCB contaminated fuel oil. A bi-weekly meeting schedule was established to pursue ongoing negotiations with EPA with the objective of achieving a settlement agreement with EPA by June 10, 1985. SCL is signing a letter confirming that agreed-upon date.

Tim Croll and Liz Edmonds will be representing SCL during the on-going negotiations.

Points of agreement reached at the initial settlement meeting were:

1. The meetings will be informal in nature.
2. The media will not be notified regarding the nature of on-going discussions at settlement meetings (to protect informality of discussions).
3. The first order of business will be establishment of a mutually agreeable schedule for project development and completion.
4. The subject of fines and penalties will be discussed after agreement on schedule and dates for completion.

Other points covered at the initial meeting were: EPA requested that SCL perform a thorough tank "sludge" analysis ASAP so that EPA can be satisfied that there are no additional toxic contaminants implicated. EPA advised that any EIS not be limited in scope to addressing only the three lead alternatives.

LC:jf